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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

|                                                                                                                                                                    |   |                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-------------------------------------------------|
| Elizabeth HUNTER; et al., on behalf of<br>themselves and all others similarly situated,                                                                            | ) |                                                 |
|                                                                                                                                                                    | ) | Case No. 6:21-cv-00474-AA                       |
| Plaintiffs,                                                                                                                                                        | ) |                                                 |
| v.                                                                                                                                                                 | ) | <b>DECLARATION OF PAUL<br/>CARLOS SOUTHWICK</b> |
| U.S. DEPARTMENT OF EDUCATION and<br>Suzanne GOLDBERG, in her official capacity as<br>Acting Assistant Secretary for Civil Rights,<br>U.S. Department of Education, | ) |                                                 |
|                                                                                                                                                                    | ) |                                                 |
| Defendants.                                                                                                                                                        | ) |                                                 |

I, Paul Carlos Southwick, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Exhibit A is Title IX Exemption Request(s) and Response(s) for Baylor University.
3. Exhibit B is Title IX Exemption Request(s) and Response(s) for Bob Jones University.
4. Exhibit C is Title IX Exemption Request(s) and Response(s) for Brigham Young University - Utah and Idaho.
5. Exhibit D is Title IX Exemption Request(s) and Response(s) for Cedarville University.

6. Exhibit E is Title IX Exemption Request(s) and Response(s) for Clarks Summit University.
7. Exhibit F is Title IX Exemption Request(s) and Response(s) for College of the Ozarks.
8. Exhibit G is Title IX Exemption Request(s) and Response(s) for Colorado Christian University.
9. Exhibit H is Title IX Exemption Request(s) and Response(s) for Dordt University.
10. Exhibit I is Title IX Exemption Request(s) and Response(s) for George Fox University.
11. Exhibit J is Title IX Exemption Request(s) and Response(s) for Indiana Wesleyan University.
12. Exhibit K is Title IX Exemption Request(s) and Response(s) for Lee University.
13. Exhibit L is Title IX Exemption Request(s) and Response(s) for Liberty University.
14. Exhibit M is Title IX Exemption Request(s) and Response(s) for Oklahoma Baptist University.
15. Exhibit N is Title IX Exemption Request(s) and Response(s) for Toccoa Falls College.
16. Exhibit O is Title IX Exemption Request(s) and Response(s) for Union University.
17. Exhibit P is Title IX Exemption Request(s) and Response(s) for York College
18. Exhibit Q is a chart documenting exemptions to Title IX statutes granted to colleges and universities attended by Plaintiffs.
19. Exhibit R documents controlling organizations for colleges and universities attended by Plaintiffs.
20. Exhibit S is a Statement of Closure for a Title IX Complaint against Brigham Young University - Idaho.
21. Exhibit T is a Statement of Closure for a Title IX Complaint against George Fox University.
22. Exhibit U is a Statement of Closure for a Title IX Complaint against Liberty University.
23. Exhibit V is a Statement of Closure for a Title IX Complaint against Spring Arbor University.
24. Exhibit W is a chart documenting federal funding for colleges and universities attended by Plaintiffs.
25. Exhibit X is a Title IX case processing manual for the Office for Civil Rights of the DoE.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 6th day of August, 2021.

By: s/Paul Carlos Southwick

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Paul Carlos Southwick